

**Florida  
Power**  
CORPORATION

December 7, 1984  
3F1284-03

Mr. Stephen M. Goldberg  
Quality Assurance Branch  
Division of Quality Assurance, Safeguards, and Inspection Programs  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
Issuance for Comment of Quality  
Assurance (QA) Guidance Related To  
Anticipated Transients Without Scram (ATWS)  
Equipment That Is Not Safety-Related

Dear Sir:

Florida Power Corporation (FPC) endorses the approach taken by the Commission in directing the NRC staff to develop guidelines for quality measures to be applied to non-safety-related equipment for ATWS. FPC also commends the NRC staff's efforts to meet with utilities, vendors, and Owner's Groups and to visit plant sites and observe first-hand utility practices for non-safety-related equipment. However, FPC has the following comments on the draft generic letter. First, the staff has gone beyond the Commissioner's direction which accompanied 10CFR50.62 (ATWS rule), explicitly limiting the scope of the ATWS quality measures to eight areas. The staff has proposed guidance in areas beyond those specifically designated in the Commissioner's directive without any justification. The draft generic letter should be rewritten to eliminate the guidance provided in the areas not specified by the Commissioners.

Secondly, FPC finds the enclosure to the draft generic letter to be vague and contradictory to the body of the letter. For example, the body of the letter states contractors and subcontractors are not required to establish QA programs as a condition of the contract. Yet, in the enclosure, the footnote associated with design control states the utility is responsible for assuring that design control measures are applied at the contractor or subcontractor organizations. Also, the enclosure requires the utility to establish measures to assure QA requirements are

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included in procurement documentation. In another instance, the enclosure states inspections are to be performed by trained personnel who did not perform the work. This is inconsistent with the guidance given in the letter allowing supervisory review and excluding QA organizational involvement. Document control is another example. The text requires documentation that this equipment is designed, installed, tested, operated, and maintained so as to assure that the design specifications have been met. The enclosure states different guidance (i.e., establish measures to maintain and control records which furnish evidence that system specifications described in the table of the ATWS rule have been met). Also, the letter states documentation is not required to be available at the plant to verify procedures were followed. FPC believes this statement is intended to mean that permanent records are not necessary for ATWS. However, without such documentation, how can an NRC inspector conclude the guidance listed in the enclosure has been implemented? The draft generic letter should be rewritten to provide in a single place all the quality measures for non-safety-related ATWS equipment to eliminate the potential for confusion.

Thirdly, the draft generic letter does not address existing equipment that is not safety-related that could be utilized for ATWS (e.g., the recirculation pump trip for BWR's and the anticipatory reactor trip for PWR's). In the supplementary information given for the ATWS rule, it was stated that existing equipment installed in accordance with previous staff requirements for the mitigation of anticipated transients without scram need not be modified. The draft generic letter should reflect that this statement also applies to the QA guidance.

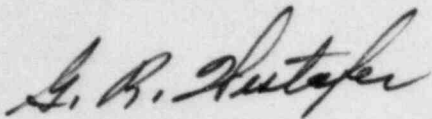
Fourthly, the draft generic letter's explicit guidance for non-safety-related ATWS equipment is implied to be a subset of the requirements of 10CFR50 Appendix B. The elements of the ATWS guidance should stand alone from the requirements of Appendix B. The draft generic letter should be rewritten to eliminate any possible links to Appendix B and focused solely on the guidance which is to be applied to the non-safety-related ATWS equipment.

Lastly, we recognize that the Commission has directed the staff to issue a generic letter which provides guidance in 8 areas. However, it is not clear that the staff found anything during their visits to plant sites which would warrant the issuance of any additional guidance in a generic letter. Since the staff: 1) concluded, in general, the existing quality practices being applied to non-safety-related equipment are adequate for non-safety-related equipment encompassed by the ATWS rule, and: 2) desires to minimize the proliferation of QA programs, FPC sees no reason to publish explicit guidance for non-safety-related ATWS equipment. The proposed generic letter's guidance is not more stringent than that already in

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place for non-safety-related equipment at our facility. In fact, FPC believes in some cases the proposed generic letter may confuse and thus compromise the effectiveness of our present QA program. The fact that management controls exist, are in place, and are working negates the need for any specific guidance from the NRC in this regard.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. R. Westafer".

G. R. Westafer  
Manager, Nuclear Operations  
Licensing and Fuel Management

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